

## **Base to Base Gondola Project**

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In an EIS report such as this I expect a minimum standard in regards to professionalism. I expect correct common sense arguments in regards to basic logical conclusions. The EIS should be as neutral as possible in its analysis and in the responses to comments. In this case, the SE Group is working for SVSH as a gondola lift designer and preparing the NEPA report that is an unacceptable conflict of interest. The simulations prepared by the SE Group in the EIS that are low resolution slanted, and misleading. In my case the responses are incomplete, incompetent, misleading, evasive, and slanted in favor of development.

Since the last commenting period, the final EIS and the comments and responses have been released. There is new information included on almost every subject in regards to the gondola and the statement in this regard is not enforceable. Instead of going in the order of my previous comments, I will group my objections by topics that I raised.

## **Commercial Ski Trail in GCW (2012-2016)**

In most of my comments, I quoted directly from the draft EIS. On this subject, I quoted a statement in regards to potential development inside GCW.

Maintaining a multi year commercial cross-country ski trail inside GCW is development. The response uses the word “infrastructure” which was not in my comment. This is an attempt to mislead and mischaracterize my comment. Aside from acknowledging that the Andregg Geomatics survey conducted in 2012 is accurate and stating “Additionally, accurate property boundaries are now delineated on the ground” my comments on this subject were ignored in the response. The responder also ignored comments from Greg Parrot (2-493) who noticed the trail in 2013 and included photos of the groomed trail taken on forest service land. Ignoring previous development expansions into GCW is not appropriate.

If all of the maps included in the EIS, are accurate, then it is safe for anyone to conclude that the snow cat trail maintained between 2012 and 2016 (listed previously on the Squaw website trails page as the KT Backcountry Gate) was

located in GCW. The remedy is for the forest service to do their job in determining violations and to enforce wilderness regulations.

## **Gazex**

Response to Joe Smith's comment (2-547)

"Also, it is important to note that the Gazex facilities have been removed by Squaw Valley Ski Holdings (SVSH) as a component of the proposal. The Gazex facilities were a primary origin of the concern that wildfire risk would increase as a result of the project (because of the storage of oxygen and propane that is required for operation of Gazex facilities); because of their removal from the proposal, it is even less likely that wildfire risk would increase as a result of the project"

This statement was not included in the master response. Since they're admitting to an increased fire hazard risk, the Gazex AM-Road exploders 5-8 should be decommissioned and removed immediately. These placements are in a forested area and less than a 1000 feet from residences. There are immense liability concerns for the parties responsible for the installation and operation. The following photos show the Gazex AM 5-8 placements and the close proximity to residences.

**Ziegler\_Gazex\_1.pdf**

**Ziegler\_Gazex\_2.pdf**

## **No Environmentally Superior Alternative**

While I didn't comment directly on alternatives, the final EIS contains a new statement about how alternatives were considered. All of the final alternatives 2,3 and 4 are slight variations in the same area due to adherence to the "Base to Base" marketing slogan that is used in the title of the EIS. The forest service should not be involved in the marketing aspect of this project. Aside from mostly impractical ideas or routes, other possibilities are not identified, described or explained in any detail. The explanation for the dismissal of other options in the EIS is short, secretive and inadequate.

**Final EIS 2.3.2.2** "The following alternative alignments were suggested for the proposed gondola"

“relocating the Alpine Meadows base terminal closer to the existing Kangaroo lift and maintenance sheds”

There’s no explanation for why this was not considered.

“approximately 39 additional conceptual alignments connecting Squaw Valley and Alpine Meadows”

This is a far-fetched claim that can’t be verified without showing at least some of the routes. Variations of this claim were first used by Andy Wirth.

<https://www.skiinghistory.org/news/white-wolf%E2%80%99s-tale>

(December 5, 2014) Wirth said they’re working with “the best mountain planners in the world,” studying up to 20 scenarios.

## **Wind**

**Final EIS 2.3.2.2** “Extensive consideration of wind directions and velocities played a part in the planning of each alternative evaluated in detail, and many potential alternatives were ultimately eliminated from detailed analysis because of these considerations.”

If this were true, the Alternative 2 route, which is an extended and exposed route over the Sierra crest, would have been the first one to be eliminated.

This statement implies that wind testing was done, but none of this information is in the EIS.

Response 0202-1: “Wind closures of the gondola would be implemented as necessary to ensure safe operation of the gondola. Further detail on this matter is beyond the scope of this analysis, as the specific operational procedures of the gondola would be determined pending Forest Service and Placer County approval of any of the action alternatives”

You can’t have it both ways. Details regarding wind are “beyond the scope of this analysis” which is why the EIS states “Extensive consideration of wind directions and velocities played a part in the planning of each alternative evaluated” High wind speeds in exposed areas are an important consideration in regards to the design, viability, operation and usability of a ski lift. This is not something that can be put off until later.

As a remedy, all wind studies done in the project area should be included in the Final EIS and a detailed explanation for why routes were retained or eliminated.

“a number of alternative alignments were considered and eliminated due to

technical and economic challenges and would not respond to any resource issues that are not already addressed through the creation of Alternatives 3 and 4”

Without providing the location and basic information of these routes, it is not possible to verify this statement.

### **The Eastern Alternative**

This proposal is my remedy for the deficiencies in the EIS and the Record of Decision.

In the Upper Truckee Restoration and Golf Course Reconfiguration EIS process, the state parks commission has held off on a golf course expansion into Washoe Meadows State Park for the time being due to an effective grassroots lobbying effort that included the Washoe Meadows Community and golf course architect, Edwin Roald. I consider myself a knowledgeable golf course designer in regards to course layouts and as a part of this effort; I submitted reduced footprint 18 hole course re-design. This course was similar to a layout from Roald’s EIS comment in regards to the land that was used and stays completely out of the state park, which is a sensible compromise alternative that was never considered before last year. I will try to do the same thing here and give you a scouting report on what I consider to be the only sensible gondola route between Squaw Valley and Alpine Meadows.

The main objective in this situation should move people around as efficiently as possible. The other goal should be to reduce environmental impacts as

much as possible. This points to studying a route that is shorter and located far away from the wilderness area and frog habitats etc. The alternatives in the EIS are all too long and close to GCW to accomplish any of this and the decision by the forest service is irresponsible in this regard. The lengths for these routes in the report are **not accurate** and are longer since they don’t take slope into account. This needs to be corrected for all alternatives.

To remedy this, the gondola should be routed in the eastern area of the Caldwell property. Another reason for this location are the highly visible Gazex exploders that were installed in this area which haven’t been mitigated in any way. In this case, one of the shortest routes is also one of the only routes possible. Almost any other route would be longer, route over the top of KT22, end near many Bear Creek residences or the current long and unrealistic

alternatives.

I'm proposing to route a gondola about 6800 feet in length, starting at the current Red Dog Chairlift base, with no mid-station at the top of the ridge and to the northeast of Bear Creek Entrance 1. From there, users would take a shuttle to the lodge and back which is about a mile. The shuttle back to the gondola would include stops located at the Bear Creek entrances etc. This is a reasonable compromise for all parties in this situation.

This route is superior to the Base to Base routes in every respect. It would be safer, faster, cheaper, less wind, and less financial risk for SVSH etc. The only downside is the route would pass through an avalanche zone on the Alpine side but this isn't any different than the Alt 2 route below the Buttress. While the base is close to a few houses, due to cars on the AM road, noise shouldn't be much of a factor. Aside from the new Gazex placements, the main source for noise pollution in Alpine Meadows is the snow making pump house that should be sound proofed. The following images show the route.

**Ziegler\_East\_Alt\_1.pdf**

**Ziegler\_East\_Alt\_2.pdf**

<b>Gondola Comparison</b>	<b>Alternative 4</b>	<b>East Alternative</b>
Gondola Type	High Speed	High Speed
Gondola Length	13000 feet	6800 feet
Ride time	14 minutes	7 minutes+7 minutes for shuttle
Operation Costs	High	Medium
Financial Risk	High	Low
Potential Loss of Alpine Side (due to sale etc)	High	Medium
Shuttle Required	Wind holds	1 mile and Wind holds
Life Span	30 to 50 years	50+ years
Visual Impairment	Very High	Medium
AM Infrastructure Crossed	Yes, road,lot and lodge	None
Total Trees removed	38+176	100
Close to GCW	Yes, 1000 feet	No, 4000 feet away
Crosses 5 Lakes Trail	Yes route borders trail for 300 feet	Yes, 100 feet near the trailhead
Cost	30 million+	15 million

In my comments I included this statement from the Alpine Meadows General Plan: "All aspects of the vast, unique and outstanding physical beauty of the area must be consciously and continuously preserved"

Response 0202-3 “Furthermore, the Alpine Meadows General Plan contains no concrete standards. While this language does not establish any concrete standards that must be adhered to and instead offers recommendations for maintaining the quality of visual resources at the ski resort, it makes clear that maintenance of the area's stunning visual character is a priority for the managers of Alpine Meadows”

That’s not what’s happening here. This statement would suggest that it is cover for doing the exact opposite. Deeds speak louder than words here. The managers of Alpine Meadows are proposing highly visible and environmentally destructive gondola routes. The responder doesn’t support this statement in any way.

#### 2.4.1.1 “Alternative 2 would result in adverse effects on visual character”

### **Alternative 4 Public Safety Issues**

The path of the Alt 3 and 4 gondola routes over the Alpine Meadows road, the parking lot, and the Alpine lodge is unprecedented breaks every basic tenet of common sense resort design. My comment on this issue was labeled as an opinion. Instead of mischaracterizing my factual and informed statement, I expect the responder to provide any example of where this has been done at any ski area in the United States. Routing a lift over a ski lodge is amateurish and incompetent. The front of the AM lodge is very high, possibly 50 feet or more and the gondola is shown to cross diagonally over the center of the north side.

This opens up many unnecessary public safety issues due to distracted drivers and ice or other objects falling from the gondola. This will ruin the entrance area, the view from the deck and lower the value of AM ski area. The outcome would make the front of the AM lodge appear to be a gigantic gondola terminal. The EIS doesn't explain or study issues involved with potentially hundreds of people disembarking in the most over crowded area of the AM slopes. There are liability issues for the operator with pedestrians walking in the parking lot and visit the lodge but don't buy lift passes that include release from liability statements.

Any resort expansion or redesign should respect the previous elements that are in place and aren't going to be changed. A transportation gondola base should not be located on the slopes. It is best to locate the termination a short distance away from the lodge in order to accommodate the extra people.

The remedy is to approve the No Action Alternative until the applicant can provide a professional level design. Another possibility is to route the gondola to the west of the lodge or locate the base to the northern edge of the front parking lot. I'm including an altered image from the EIS to show these possibilities. There are only minor logistical issues involved in comparison to routing over the lot and the lodge. While you can kludge all kinds of terminal locations here, the fact remains that the AM base area is not receptive to lifts routed from any direction at this time. The No Action Alternative is the only responsible course of action at this time.

## **Eldora Decision**

Response 0202-8 “Under NEPA, however, socioeconomic effects are required to be addressed, and they are in Section 4.5, "Socioeconomics and Environmental Justice," of the Draft EIS/EIR. It is noted that the majority of this comment references a ski area project analysis located in Boulder County, Colorado, the specifics of which are not germane to this analysis”

This is false. The forest service made a reasoned compromise decision that respected the advice of local residents.

“Section 1.6 of the Draft EIS/EIR provides a chronology and considerable detail regarding the public engagement process, which was conducted as a portion of this analysis and included opportunities for local property owners to consult and provide their thoughts on the project”

Which implies you can ignore everybody’s advice now. Comments in regards to the draft and final EIS are the most important part in this process. The Alternative 2 route was first proposed in 2015 and there’s been no change in the design since then, which indicates that consult and advice from local property owners has been ignored. The only concession has been the elimination of the Buttress Gazex placements, but the stated reason for this is that gondola approval is a priority.

## **5 Lakes Trail Closure**

Shelito Comment: 5 Lakes Trail will be closed during construction.

Response: “In addition, RPM REC-3 states that "Signs advising recreationists of construction activities and directing them to alternative trails will be posted at all trail access points”

There is no viable alternative to the 5 Lakes Trail. While it is possible to hike long and convoluted routes to 5 Lakes from the Squaw base, hardly anyone will attempt it if the 5 Lakes trail is closed. Any other route from either Alpine or Squaw requires mountaineering skills over class 2-3 terrain. For all practical purposes, the 5 Lakes area will be closed for most of the summer season while the gondola is built. There is no mitigation for this.



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